

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JANICE STEVENSON,)
)
 Plaintiff,)
)
 v.) CIVIL ACTION NO. 05-CV-11584-DPW
)
 NEIGHBORHOOD HOUSE CHARTER)
 SCHOOL,)
)
 Defendant.)

PLAINTIFF'S OPPOSITION TO DEFENDANT'S
MOTION TO EXTEND TIME TO FILE

I, Janice Stevenson, object to the Defendant's Motion to Extend Time to file a response. In support thereof, state the following:

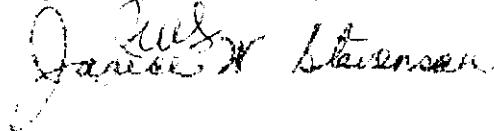
1. The Defendant's defense to Plaintiff's FLSA claim has been clearly unsupported by the evidence.
2. The Defendant has always known that its defense to the Plaintiff's FLSA claim could never be substantiated.
3. It has become evident that the School cannot substantiate its allegation that Plaintiff is an independent contractor, from August 2004 to June 2005 or anytime; or an administrative employee at Defendant's business. It has become evident that the School cannot substantiate its allegation that Plaintiff is an independent contractor, from August 2004 to June 2005 or anytime; or an administrative employee at Defendant's business.
4. Defendant's discovery process is a ruse. The Defendant's sole strategy in this FLSA claim is to obtain sanctions and get Plaintiff's FLSA claim dismissed on procedural grounds.

6. The Defendant's fraud, misrepresentations to this Honorable Court, and other misconduct should be sanctioned.
7. The Defendant has refused requests for employment documents, payroll records or any documents to substantiate independent contractor payments to Plaintiff.
8. The Defendant has sought discovery of Plaintiff's financial records from as far back as 2000; however, the Defendant cannot show to this Court whether Plaintiff was, as a matter of economic reality, dependent on the Defendant's business she served, or, conversely, whether she was in business for herself from August 2004 to June 2005.

WHEREFORE, Plaintiff, Janice Stevenson, requests that this Court deny Defendant's request for an extension to file. Plaintiff requests that the Court grant summary judgment in this matter against Defendant, sanction Defendant for fraud/misrepresentation, and order Defendant to pay Plaintiff's costs and attorneys' fees in this matter.

Date: January 10, 2007

Respectfully submitted by,



Janice Wilson Stevenson
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CERTIFICATE OF SERVICE

I hereby certify that this document was served on Neighborhood House Charter School by electronic mail to:

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Danese W. Stevenson